From: Murphy, Michael D.
To: Murphy, Michael D.

**Subject:** FW: SPAVI v. PCJV USA, LLC et al.: Discovery Requests

**Date:** Thursday, April 3, 2025 12:50:37 PM

**From:** Beral, Arash <arash.beral@blankrome.com>

Sent: Wednesday, January 8, 2025 6:19 PM

To: Kenneth Hsu <<u>khsu@ecjlaw.com</u>>; Malynn, Todd M. <<u>Todd.Malynn@BlankRome.com</u>>

**Cc:** Michael D. Murphy < mmurphy@ecilaw.com >; Sandoval, Victor

< Victor. Sandoval@BlankRome.com>

Subject: RE: SPAVI v. PCJV USA, LLC et al.: Discovery Requests

Thank you, Kenny. I'm sorry to hear that. A lot of people on our side have been affected by the fires as well. Hope you all stay safe, and let us know if you need anything.

On this, I just want to confirm that you will agree to amend the Case Management Order. The Court had suggested we meet and confer about that (which we can do when convenient for you). Provided that you are in agreement with amending the CMO, then yes.

Arash

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From: Kenneth Hsu < <a href="mailto:khsu@ecjlaw.com">khsu@ecjlaw.com</a>>
Sent: Wednesday, January 8, 2025 3:00 PM

To: Beral, Arash <arash.beral@blankrome.com>; Malynn, Todd M. <Todd.Malynn@BlankRome.com>

**Cc:** Michael D. Murphy < <u>mmurphy@ecjlaw.com</u>>; Sandoval, Victor

< <u>Victor.Sandoval@BlankRome.com</u>>

**Subject:** SPAVI v. PCJV USA, LLC et al.: Discovery Requests

Arash, Todd,

I hope you had a happy new year's holiday. Mike and I are in the process of finalizing SPAVI's responses to PCJV USA, LLC's First Set of Interrogatories and Requests for Production. However, both he and I are now being affected by the ongoing fires (both of our families will likely be evacuating tonight) and may not have much time to focus on our matters, potentially for the next few days. In light of that, we request a modest one-week extension of time to respond (to 1/16) to those discovery requests. Please advise if this agreeable to your firm.

Thank you in advance.

Thanks, Kenny
Kenneth P. Hsu, Esq. Partner
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